

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

X

Index No.:

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WILLIAM MARTIN,

PLAINTIFF,

-against-

THE NEW YORK PUBLIC LIBRARY, ZENA GEORGE,  
CHARMAINE MCFARLANE, BEN SAPADIN,  
TERRANCE NEAL, AND JESSICA ROSENTHAL,

DEFENDANTS.

X

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TORTS ACTION

## TO THE ABOVE-NAMED DEFENDANTS:

**YOU ARE HERBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if the summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

DATED: NEW YORK, NEW YORK  
SEPTEMBER 20, 2024

By: /s/ Yuxi Liu.

Yu-Xi (Glen) Liu, Esq.

*Attorney for Plaintiff*

53 Elizabeth Street, Suite 2C.

New York, NY 10013

[Glen@Dawnlaw.us](mailto:Glen@Dawnlaw.us)

212.597.2888

DEFENDANTS' ADDRESS

SEE SCHEDULE OF DEFENDANTS  
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**NOTICE:** The torts action is for discrimination, hostile workplace, intentional infliction of emotional distress, negligent infliction of emotional distress, defamation, and injunction with TRO against defendants restraining them from denying the plaintiff's request for disability leave which has been previously approved.

**The relief sought** is injunction, punitive, exemplary and compensatory damages, and attorney fees.

Upon your failure to appear, judgment of \$3,000,000.00 will be taken against you by default plus attorney fees together with the costs and disbursements of this action.

## SCHEDULE OF DEFENDANTS' ADDRESS

### THE NEW YORK PUBLIC LIBRARY (THE "NYPL")

#### NYPL LEGAL DEPARTMENT

476 FIFTH AVENUE  
ROOM 78  
NEW YORK, NY 10016  
212.930.0552

### ZENA GEORGE

ASSISTANT DIRECTOR, SNFL  
STAVROS NIARCHOS FOUNDATION (SNFL)  
455 FIFTH AVENUE  
NEW YORK, NY 10016  
212.340.0904

### BEN SAPADIN

SUPERVISING LIBRARIAN  
STAVROS NIARCHOS FOUNDATION (SNFL)  
455 FIFTH AVENUE  
NEW YORK, NY 10016

### TERRANCE NEAL

VICE PRESIDENT, HUMAN RESOURCES  
270 MADISON AVENUE  
NEW YORK, NY 10016

### CHARMAINE MCFARLANE

SENIOR HUMAN RESOURCES BUSINESS PARTNER  
270 MADISON AVENUE  
NEW YORK, NY 10016

### JESSICA ROSENTHAL

SENIOR HUMAN RESOURCES BUSINESS PARTNER  
270 MADISON AVENUE  
NEW YORK, NY 10016